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Cigna Health and Life Insurance Company

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MARCO PALLAZI AND PIERANGELA
BONELLI,

Plaintiff,

v.

CIGNA HEALTH AND LIFE
INSURANCE COMPANY, JOHN OR
JANE DOE 1 THROUGH 100,
FICTITIOUS NAMES BEING
NATURAL PERSONS AT PRESENT
UNIDENTIFIED, XYZ CORPORATIONS
1 THROUGH 100, FICTITIOUS NAMES
BEING CORPORATIONS AT PRESENT
UNIDENTIFIED, ABC ENTITIES 1
THROUGH 100, FICTITIOUS NAMES
BEING COMMERCIAL ENTITIES AT
PRESENT UNIDENTIFIED.

Defendants.

No. 2:22-cv-06278-JMV-AME

Document electronically filed

**DECLARATION OF E. EVANS
WOHLFORTH, JR. IN SUPPORT
OF DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT**

E. Evans Wohlforth, Jr., of full age, hereby declares pursuant to 28 U.S.C.

§ 1746 as follows:

1. I am an attorney admitted before the United States District Court for the District of New Jersey, and a Director of the firm of Gibbons P.C., counsel for

Defendants Cigna Health and Life Insurance Co. and Connecticut General Life Insurance Company (“Defendant”), in the above-captioned action. In this capacity I am personally familiar with the matters asserted herein.

2. I submit this Declaration in Support of Defendants’ Motion to Dismiss Plaintiff’s Complaint.

3. Attached as **Exhibit A** is a true and correct copy of a letter dated August 18, 2021 from Cigna to Pierangela Calzoni Bonelli.

4. Attached as **Exhibit B** is a true and correct copy of a letter dated August 19, 2021 from Cigna to Pierangela Calzoni Bonelli.

5. Attached as **Exhibit C** is a true and correct copy of Summary Plan Description of the Om Log USA Inc health benefits plan.

I hereby declare under penalty of perjury that the foregoing is true and

Dated: January 31, 2023

By: /s/ E. Evans Wohlforth, Jr.
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*Attorneys for Defendant Cigna Health
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EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL

EXHIBIT C

FILED UNDER SEAL